

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**CIVIL ACTION NO. 2005-10508-  
RGS**

**JOSEPH E. BLAKE,  
Plaintiff,**

**v.**

**ROBERT MURPHY, *et al*,  
Defendants.**

**MOTION TO FILE MEMORANDUM IN EXCESS OF  
TWENTY PAGES OF DEFENDANT COMMONWEALTH OF  
MASSACHUSETTS**

Now come defendants, Robert Murphy and Kathleen Dennehy, and move this Honorable Court to allow them to file a memorandum in support of their Motion to Dismiss/Summary Judgment, in excess of the 20 pages permitted pursuant to LR. 7.1(B)(4).

As grounds therefor, the defendants state that the plaintiff has filed a 25 page complaint and a 6 page amended complaint containing 111 paragraphs of allegations contained in 9 separate counts against the defendant. Furthermore, this Court has ordered the defendants to respond “in detail” to plaintiff’s allegations regarding his conditions of confinement. As such, it is in the interest of justice to allow the defendants to file a memorandum in excess of 20 pages in order to fully respond to the plaintiff’s numerous factual allegations, legal arguments and theories of recovery.

WHEREFORE, the Defendant respectfully requests that this Honorable Court allow this motion.

Defendants Robert Murphy and Kathleen  
Dennehy,

NANCY ANKERS WHITE  
Special Assistant Attorney General

By /s/ Brian P. Mansfield  
Brian P. Mansfield, Counsel  
Department of Correction  
Massachusetts Treatment Center  
30 Administration Road  
Bridgewater, Massachusetts 02324  
(508) 279-8183  
(508) 279-8181 (fax)  
BBO # 564671

Dated: March 20, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that I did this day serve a photocopy of the above document upon the plaintiff by arranging for its delivery via the Department of Correction intra-facility mail system to him at Massachusetts Treatment Center, 30 Administration Road, Bridgewater, MA 02324.

/s/ Brian P. Mansfield  
Brian P. Mansfield

Dated: March 20, 2006